

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,
v
NOLI TCRUZ,
Defendant

Case No.: 2:24-cr-51333
Hon. Denise Page Hood

F I L E D
JAN 10 2025
CLERK'S OFFICE
DETROIT

APPLICATION FOR WRIT OF EXECUTION

The United States of America, Plaintiff, makes application in accordance with 18 U.S.C. § 3613 and 28 U.S.C. § 3203 Federal Debt Collection Procedures Act (FDCPA) to the Clerk of the United States District Court to issue a Writ of Execution for substantial nonexempt property belonging to or due Defendant, Noli Tcruz as follows:

1. Defendant Noli Tcruz, whose last known address is in Washington Township, Michigan, is indebted to United States in the amount of \$5,890,337.69. Interest is not accruing on the debt. This indebtedness is the result of a criminal judgment entered against Defendant on September 5, 2024. (ECF No. 194).
2. Zero payments have been made towards the judgment debt, leaving a total balance due of \$5,890,337.69, as of January 10, 2025,

3. There is or may be property in which the Defendant has possession, custody, or control, and in which the Defendant has a substantial nonexempt interest which may be levied upon for payment of the above judgment. This property can be described as follows: a box of cash and other valuable personal property located at 66701 Notre Dame Boulevard, Washington Township, Michigan (the “Property”).

WHEREFORE, Plaintiff, the United States of America, respectfully requests that the Clerk:

1. Issue one (1) certified copy of a Writ of Execution;
2. Direct the United States Marshal to enter any property owned, occupied, or controlled by the Defendant, as pursuant to 28 U.S.C. § 3102(d), to access the personal property on the Property where Defendant or individuals acting on his behalf or at his direction have maintained valuable personal property including but not limited to cash, jewelry, and other valuables in concealed containers that may not be apparent upon visual inspection of the subject premises of the Property, so authorizing permission during the course of executing this writ to investigate any locations within the Property, including safes, compartments, or any partitioned section or storage area that may contain any items of value;
3. Post a copy of the writ and notice of levy in a conspicuous place upon the

Property; and

4. Award costs as incurred by the United States Marshal in executing said Writ.

Respectfully submitted,

DAWN N. ISON
United States Attorney

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Date: January 10, 2025